

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN THE MATTER OF:)	
)	
VARNELL WOODS and)	Case Number: 21-42564
REGINA WOODS)	
)	Chapter 13 Bankruptcy
Debtors.)	
KEVIN MANNION,)	Motion to Lift Stay Filed by
)	Kevin Mannion
Movant,)	
)	
v.)	Ott Law Firm, LLC
)	3544 Oxford Ave
REGINA WOODS,)	Maplewood, MO 63143
)	(314) 293-3756
Debtor,)	
)	Hearing date: May 12, 2025
and)	Hearing Time: 10:00 AM
)	Objection Deadline: May 5, 2025
Diana S. Daugherty)	
)	
Trustee)	
)	
Respondents.)	

**NOTICE OF HEARING AND MOTION FOR RELIEF FROM AUTOMATIC STAY
TO RECOVER INSURANCE PROCEEDS**

WARNING: THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE BY MAY 5, 2025. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU.

IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. THE DATE IS SET OUT ABOVE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING. REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS. THE HEARING TO BE HELD ON THE DATE AND TIME ABOVE BEFORE THE HONORABLE KATHY A.

SURRATT-STATES, IN THE UNITED STATES BANKRUPTCY COURT, EASTERN DISTRICT OF MISSOURI, THOMAS F. EAGLETON U.S. COURTHOUSE, 111 SOUTH TENTH STREET, FLOOR 7, NORTH COURTROOM, ST. LOUIS, MO 63102.

COMES NOW Kevin Mannion and for his Motion for Relief from Automatic Stay to Recover Insurance Proceeds, pursuant to Federal Rule of Bankruptcy Procedure, Rule 4001 states as follows:

1. Debtor Regina Wood is named as a Defendant in Movant Kevin Mannion's personal injury lawsuit which was filed in the Circuit Court of St. Charles County, Cause Number 2211-CC00058.

2. The underlying personal injury lawsuit arises out of a motor vehicle accident that occurred on October 25, 2018, where the movant was struck from behind by Regina Wood when he stopped due to the traffic on Mexico Road, St. Charles County.

3. There exists an insurance policy covering Debtor Regina Wood in effect at the time of this incident, which would pay damages in the lawsuit described above. The insurance proceeds do not constitute an asset of Debtor's estate.

4. Movant Kevin Mannion learned of Debtor Wood's bankruptcy filing after the Plan was already confirmed by this Court.

5. Movant Kevin Mannion only seeks relief from the automatic stay to recover any applicable insurance policy proceeds.

6. Movant Kevin Mannion's request does not affect the Plan confirmed on October 1, 2021, for Debtor Wood.

WHEREFORE, Kevin Mannion respectfully requests relief from the automatic stay, pursuant to Bankruptcy Rule 4001, to recover the insurance proceeds and for all other orders as the Court deems just and proper.

Dated: 04/21/2025

Respectfully Submitted,

/s/ Guolong Chen

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Attorney for Movant Kevin Mannion

Certificate of Service

I certify that a true and correct copy of the foregoing document was filed electronically on April 21, 2025, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court pursuant to CM/ECF as set out on the Notice of Electronic filing as issued by the Court or in the alternative has been served by depositing a true and correct copy of same enclosed in a postage prepaid, properly addressed envelope, in a post office official depository under the exclusive care and custody of the United States Postal Service within the state of Missouri on those parties directed by the Court on the Notice of Electronic Filing issued by the Court as required by the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court.

/s/ Guolong Chen

Electronic Mail Notice List

The following is the list of attorneys who are currently on the list to receive e-mail notices for this case.

Jack Justin Adams contact@thinkadamslaw.com
Attorney for Debtor

Diana S. Daugherty standing_trustee@ch13stl.com
Office of the United States Trustee